

REMARKS

I. Status of Claims

Claims 1-16, 28, and 29 are pending in this application. In view of the following remarks, reconsideration and prompt early allowance are respectfully requested.

II. Rejection of Claims 1-3, 7-10, 12, 15, 16, 28, and 29 under 35 U.S.C. §103(a)

Claims 1-3, 7-10, 12, 15, 16, 28, and 29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,161,126 to Wies *et al.* (hereinafter “Wies”) in view of U.S. Patent No. 6,028,605 to Conrad *et al.* (hereinafter “Conrad”). This rejection is respectfully traversed.

The references, even if combined, fail to teach the limitations of independent claims 1, 7, and 28. Both references fail to disclose several features of the independent claims. In claim 1, the Office Action (page 3 lines 1-8) acknowledges that Wies does not teach a markup language “**core engine**” for providing categories of behaviors, at least one “**external component**” designed to provide categories of external component behaviors, nor a “**mechanism**” included in the core engine. Since it is true that Wies does not disclose these devices, Wies can not possibly teach “a pair of interfaces associated with each **external component** for communication between the external component and the **core engine**, wherein **the mechanism** and the **external component** communicate through the pair of interfaces, as stated in the Office Action. Therefore, Wies does not disclose the limitations of claim 1.

Conrad also fails to teach or disclose the limitations of claim 1. Conrad fails to disclose a “markup language core engine for providing categories of behaviors including layout and rendering behaviors.” “Layout behaviors” are behaviors that specify how markup language elements are to be laid out, or positioned and sized on a medium (see specification page 8 line 22

thru page 9 line 1). “Rendering behaviors” are behaviors that specify how markup language elements are to be rendered, or drawn on a medium (see specification page 8 lines 21-22). Conrad discloses no teaching of layout behaviors that specify how the markup language is supposed to be laid out or rendering behaviors that specify how markup language elements are to be rendered. Conrad does teach class categories (col.3 lines 63-67), however, these class categories merely “collaborate to provide a set of services.” Conrad does not disclose the categories are layout behaviors and rendering behaviors.

It is further challenged that Conrad does not teach “at least one external component designed to provide categories of external component behaviors including at least one of an external component layout behavior and an external component rendering behavior in addition to the behaviors provided by the core engine.” Conrad does not teach this limitation because, as mentioned above, Conrad does not teach layout behaviors or rendering behaviors. Conrad further does not disclose a process of an external component providing categories of “external components behaviors” in addition to providing “behaviors provided by the core engine.”

Moreover, Conrad does not teach “a mechanism included in the core engine to extend a selected category of behavior of the core engine with the behaviors of a same category of the at least one external component, such that the behaviors of the same category of the at least one external component participate with the behaviors of the core engine.” It appears that the Office Action references plug-ins (col.4 lines 45-54) to read upon this limitation, however, as explained in the background of the invention of the present application on page 2 lines 8-19, plug-ins do not participate with the core engine. Although a plug-in may provide capabilities not possessed by the core engine, the core engine delegates all functioning to the plug-in automatically and does not “participate” with the behaviors of the plug-in. Furthermore, there is no teaching within

Conrad to suggest that plug-ins are “included in” the core engine or that the core engine “participates” with the behaviors of plug-ins as stated in claim 1. Therefore Conrad does not disclose the limitations of claim 1.

In order to make out a prima facie case of obviousness, the references cited by the Examiner must provide all of the elements of the invention as claimed and a suggestion to combine the disclosures of the various cited art references to make the claimed invention. *In re Geiger*, 815 F.2d 686,688 2 USPQ2d 1276, 1278 (Fed. Cir. 1987); *ACS Hospital Systems, Inc. v. Montefiore Hospital*, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984).

Additionally, Conrad fails to provide a teaching or suggestion for modifying Wies. No motivation would have existed to modify Wies to include a plug-in as disclosed by Conrad. Wies is directed to providing an entirely different category of functionality and not to extending existing capabilities of the core engine in a selected category of behavior. Accordingly, no motivation would have existing for adding a plug-in as disclosed by Conrad to the force effects system disclosed by Wies.

In order to make a prima facie case of obviousness, a teaching or suggestion of the combination must be found in the prior art. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). Also, if a proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).

Claims 2 and 3 depend from claim 1 and therefore define over the art of record for at least the reasons set forth with respect to claim 1.

Regarding claim 7, both references, even if combined, fail to disclose the limitations of claim 7. It should first be noted that the Office Action acknowledges that Wies does not teach

the claimed devices such as “core engine,” “external component,” and “mechanism” of claim 1 (Office Action page 3 lines 1-8). However, the Office Action now contends that such devices are taught by Wies in regards to claim 7. Such assertion cannot be valid as it contradicts the Office Action’s previous acknowledgement. Furthermore, Wies again discloses neither a “layout behavior” or a “rendering behavior” as stated in claim 7. Wies continues in failing to teach the limitations of claim 7 by not disclosing “calling a behavior initialization method of the external component to determine how the behavior of the external component participates with the behavior of the core engine,” “calling a behavior method of the external component for the external component to provide the behavior of the external component when the core engine is providing the behavior of the core engine, so that the behavior of the external component participates with the behavior of the core engine,” and “receiving a call to a corresponding behavior method of the mechanism for the external component to communicate with the core engine during participation of the behavior of the external component with the behavior of the core engine.”

The Office Action further alleges that the limitations of claim 7 not taught by Wies are in fact taught by Conrad. Applicant challenges the contention that Conrad teaches any limitation of claim 7. There is no teaching within Conrad that discloses participation between the core engine and the external component includes “**supplementing** core engine behavior with external component behavior **in one mode**” and “**replacing** core engine behavior with external component behavior **in another mode**.” The ideas of supplementing and replacing behaviors in different modes are limitations that are not present in Conrad nor Wies. In the Office Action’s “Response to Arguments” it is alleged that Conrad mentions an initialization method (col.8 lines 16-17). However, a mere mentioning of an “initialization service” does not teach a “behavior

initialization method of the external component **to determine** how the behavior of the external component participates with the behavior of the core engine.” There is no determination step found in the mere mentioning of an “initialization service” that is equivalent to the initialization method stated in the above limitation of claim 7. Therefore the combination of Wies and Conrad does not fully disclose all limitations of claim 7.

Claims 8-10, 12, 15, and 16 depend from independent claim 7 and are allowable over the art of record for at least the reasons set forth above with respect to claim 7.

Claim 28 is a computer-readable medium claim that includes features analogous to those set forth above with respect to claim 1 and therefore defines over the art of record for at least the reasons set forth above with respect to claim 1. Claim 29 depends from claim 28 and is therefore also allowable over the art of record.

As explained above, Wies and Conrad fail to render obvious claims 1-3, 7-10, 12, 15, 16, 28, and 29. Accordingly, withdrawal of the rejection of these claims under 35 U.S.C. §103 is respectfully requested.

III. Rejections of Claims 4-6, 11 under 35 U.S.C. §103(a)

Claims 4-6 and 11 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Wies *et al.*, in view of Conrad *et al.* as applied to claim 1 and in further view of U.S. Patent No. 6,585,777 to Ramaley *et al.* (hereinafter “Ramaley”). This rejection is respectfully traversed.

Ramaley fails to preclude the deficiencies of Wies and Conrad noted above. In the Office Action’s “Response to Arguments” it is alleged that Ramaley cures the deficiencies of Wies and Conrad by “mention[ing] comparing files” and “mention[ing] attached behaviors that can be applied and removed.” A mere mentioning of comparing files and attached behaviors does not correct the deficiencies of Wies and Conrad in regards to independent claims 1, 7, and 28.

Claims 4-6 depend from claim 1 and define over the art of record for at least the reasons set forth above with respect to claim 1. Claim 11 depends from claim 7 and is allowable over the art of record for at least the reasons set forth above with respect to claim 7. Accordingly, withdrawal of the rejection is respectfully requested.

IV. Rejections of Claims 13 under 35 U.S.C. §103(a)

Claim 13 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Wies *et al.*, in view of Conrad *et al.*, as applied to claim 12 and in further view of U.S. Patent No. 6,636,219 to Merrick *et al.* (hereinafter “Merrick”), and in further view of Ramaley *et al.*, and in further view of U.S. Patent No. 6,324,551 to Lamping *et al.* (hereinafter “Lamping”). This rejection is respectfully traversed.

Merrick, Ramaley, and Lamping fail to preclude the deficiencies of Wies and Conrad noted above. In the Office Action’s “Response to Arguments” it is alleged that Lamping cures the deficiencies of Wies and Conrad by “mention[ing] a call being made to a document management system.” A mere mentioning of a call being made does not correct the deficiencies of Wies and Conrad in regards to independent claims 1, 7, and 28. Claim 13 depends from claim 7 and defines over the art of record for at least the reasons set forth above with respect to claim 7. Accordingly, withdrawal of the rejection is respectfully requested.

V. Rejections of Claims 14 under 35 U.S.C. §103(a)

Claim 14 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Wies *et al.*, in view of Conrad *et al.*, as applied to claim 12, in further view of Ramaley *et al.*, and in further view of Lamping *et al.* This rejection is respectfully traversed.

Ramaley and Lamping fail to preclude the deficiencies of Wies and Conrad noted above. Claim 14 depends from claim 7. Accordingly, claim 14 defines over the art of record for at least

Appl. No. 09/677,403
Amdt. dated March 25, 2005
Resp. to Office Action of January 27, 2005


the reasons set forth above with respect to claim 7. Withdrawal of the rejection is respectfully requested.

VI. Conclusion

Applicants respectfully submit that the rejections have been overcome and claims 1-16, 28, and 29 are now believed to be in condition for allowance. Allowance of all pending claims is respectfully requested. However, if the Examiner believes that any issues remain, the Examiner should feel free to contact the undersigned at the telephone number below. The Commissioner is hereby authorized to charge any additional fees that are required or credit any overpayment to Deposit Account No.19-2112 referencing MFCP 87510.

Respectfully submitted,

Dated: March 25, 2005


Kerry H. Owens
Reg. No. 37,412

SHOOK, HARDY & BACON L.L.P.
2555 Grand Blvd.
Kansas City, Missouri 64108-2613
Telephone (816) 474-6550
Facsimile (816) 421-5547